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ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MB Docket 05-263, RM-11269

The Joint Parties

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College Creek Broadcasting, LLC

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October, 2005

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INTRODUCTION

This engineering statement is prepared in support of a counterproposal (to MB 05-263, hereinafter referred to as the "NPRM") filed by Desert Sky Media, LLC, licensee of KVGS(FM) Laughlin, UT; College Creek Broadcasting, permittee of channel 237C1 Teec Nos Pos, AZ ("College Creek"); and Smoke and Mirrors, LLC, licensee of KRRK(FM) Lake Havasu City, AZ and KFTT (FM) channel 276C3 Bagdad, AZ (the "Counterproposal"). In the instant statement these parties will be referred to as the Joint Parties or the Parties. The Joint Parties submit that the public interest will be served by implementing their proposed scenario. Many of the proposed modifications can happen only inside the context of the Parties' Counterproposal since the moves are inextricably intertwined. Following the spectrum modifications advanced by the Joint Parties, a first aural service will be provided to a total of 802 persons (white area eliminated), a second aural service will be provided to a total of 395 persons (gray area eliminated), a new first local service will be provided to three new communities totaling 4,702 persons, and a new primary service will be provided to 2,583,685 persons in four states.

METHODS

A summary of all communities and their related channels (present and proposed) is included in Table 1 for reference. The following amendments to the FM Table of Allotments are requested (listed alphabetically):

Community	**Existing**	**Proposed**
Ash Fork, AZ	**267A**	**277A**
Desert Hills, AZ	----	**276C0**
Bagdad, AZ	**269C3, 276C3**	**290A, 299A**
First Mesa, AZ	**247C**	**237C**
Fredonia, AZ	**278C1**	**247C1**
Meadview, AZ	----	**300C**
Pauldin, AZ	**263C3**	**228C3**
Payson, AZ	257C2, **266C1**	257C2, **240C1**
Peach Springs, AZ	**285C3**	**267C3**
Quartzsite, AZ	232A, **275C3, 290C2**	232A, **267C3, 251C2**
Seligman, AZ	**277C3**	**239C3**
Spring Valley, AZ	----	**266C**
St. Johns, AZ	**239C**	**251C**
Teec Nos Pos, AZ	**237C1**	**278C2**
Essex, CA	**255B, 280B**	**255B, 280B**
Cal-Nev-Ari, NV	**285A**	----
Ely, NV	224C2, **269C3**	224C2, **256C**
Laughlin, NV	**300C**	**285C2**
Moapa Valley, NV	224C, 284C1	224C, **255C**, 284C1
Pioche, NV	**255C**	**268C**
Hurricane, UT	**276C**	**260C**
Kanab, UT	266C	266C, **276C**
St. George, UT	291C2, **260C**	291C2

First, all proposed spectrum modifications are depicted in the form of a detailed channel or allocations study that shows the spacing to all known pertinent FM facilities, licenses, approved, pending requests, and proposed additions (deletions). If a site change is proposed, a 70 dBu contour map is included to verify compliance with §73.315 (city grade to 100% of the proposed community of license). Second, a gain/loss map depicts the population and land area that gains or loses reception. Finally, with respect to modifications in which a change in the community of license is proposed, the Joint Parties have also included a remaining services study showing that no white area is created and that all areas continue to have a minimum of two remaining services. The vast majority of all loss areas have five or more remaining services. This engineering statement is concluded with a cumulative gain/loss study giving the net gain of the Joint Parties' counterproposal.

JOINT PARTIES' COUNTERPROPOSAL MODIFICATIONS EXPLAINED

The Joint Parties propose to modify the spectrum in the following manner:

(1) Add channel 256C to Ely as that community's first wide area station;

(2) delete channel 255C at Pioche and allot MX channel 255C at Moapa Valley, NV for use by KBZB;

(3) delete channel 269A at Ely, NV and allocate channel 268C at Pioche, NV for use by KCLS (service replacement);

(4) substitute channel 280B for channel 255B at the licensed site of KHWY Essex, CA;

(5) substitute channel 265B for VAC channel 280B at Essex, CA;

(6) delete channel 266C0 at Lake Havasu City, AZ and allocate channel 266C to Spring Valley, AZ for use by KRRK;

(7) substitute channel 240C1 for channel 266C1 at the licensed site of KNRJ(FM) Payson, AZ;

(8) delete channel 239C0 at Cottonwood, AZ and allocate MX channel 239C3 at Seligman, AZ for use by KZGL(FM);

(9) substitute KWKM's channel 239C St. Johns, AZ with channel 251C;

(10) substitute channel 277A for VAC channel 267A at Ash Fork, AZ;

(11) delete channel 277C3 (CP) at Seligman, AZ and allocate channel 276C0 at Desert Hills, AZ for use by KZKE(FM);

(12) substitute channel 299A for channel 276C3 at Bagdad, AZ for use by KFTT(FM);

(13) delete channel 300C at Laughlin, NV, and allocate channel 300C at Meadview, AZ, for use by KVGS(FM);

(14) delete channel 285A at Cal-Nev-Ari, NV, and allocate channel 285C2 at Laughlin, NV for use by the CP;

(15) substitute channel 267C3 for VAC channel 285C3 at Peach Springs, AZ;

(16) substitute channel 267C3 for VAC channel 275C3 at Quartzsite, AZ;

(17) delete channel 276C at Hurricane and allocate channel 276C at Kanab using the community reference coordinates;

(18) delete channel 260C at St. George, UT and allocate 260C to Hurricane, UT for use by KONY as a replacement service that requires no technical modifications;

(19) substitute channel 247C1 for channel 278C1 using the vacant channel allotment reference at Fredonia, AZ;

(20) substitute channel 237C for channel 247C using the vacant channel allotment reference at First Mesa, AZ;

(21) substitute channel 278C2 for channel 237C1 at Teec Nos Pos, AZ for use by the CP at Teec Nos Pos. The use of channel 278C2 at Teec Nos Pos is MX with the proposed use of channel 278C at Church Rock, MN. Therefore, the Counterproposal is mutually exclusive with the NPRM of MB Docket 05-263;

(22) substitute channel 228C3 for VAC channel 269C3 at Paulden, AZ;

(23) substitute channel 290A for VAC channel 269C3 using the community reference coordinates at Bagdad, AZ; and

(24) substitute channel 251C2 for VAC channel 290C2 using a modified site at Quartzsite, AZ.

The following discussion describes each proposed modification in sequential order.

1) **Add New Wide Area Service Channel 256C at Ely, NV** The Joint Parties proposed to add channel 256C at Ely as that community's first wide area service. College Creek is simultaneously filing an expression of interest in the allotment of this channel. The allotment of channel 256C can be made using the US Census Bureau's coordinates for the community of Ely as allotment reference. It requires only one sub move, the deletion of channel 255C at Pioche. The distance between channel 256C at Ely and the licensed site of KBZB is 152.48 kilometers, while 241.0 kilometers are required to be fully spaced. This creates a prohibited short space of 88.52 kilometers (licensed site) or 39.30 kilometers (CP site). The Joint Parties propose to eliminate this prohibited short space by deleting channel 255C at Pioche and allotting it to Moapa Valley, NV as that community's second local service. However, presently the only local service at Pioche is KBZB. The Joint Parties propose to continue

providing uninterrupted service to Pioche by deleting channel 269A at Ely and allotting MX channel 268C at Pioche for use by KCLS.

a) **KBZB – Proposed channel 255C Moapa Valley, NV** (Current CH 255C, Pioche, NV)

The modification of KBZB to operate on channel 255C at Moapa Valley, NV creates a short space of 49.29 kilometers to KHWY Essex, CA, on channel 255B. The amount of the short space is large enough that an alternate site on the part of either station will not correct the prohibited short space. Therefore, an alternate channel for KHWY is proposed on 280B.

i) **KCLS - Proposed channel 268C Pioche, NV** (Current CH 269A Ely, NV)

REPLACEMENT SERVICE The Joint Parties propose to provide a licensed, seamless aural service by deleting channel 269A at Ely, NV, and allocating channel 268C to Pioche for use by KCLS. The distance between channel 269A at Ely and channel 268C at Pioche is 154.41 kilometers, while 165.0 kilometers are required to be fully spaced. This creates a prohibited short space of 10.59 kilometers (licensed) or 21.56 (pending app). Therefore, the two sites are mutually exclusive. This allotment will offer uninterrupted service to the residents of Pioche and the KBZB service area. The KCLS 60 dBu contour will exceed the current KBZB 60 dBu so no listeners in the primary service area will ever be without aural service. The proposed KCLS 60 dBu will be larger in service area since KBZB operates as a substandard class C, and KCLS will utilize the current KBZB licensed site (though with a maximum class C facility).

ii) **KHWY – Proposed channel 280B Essex, CA** (Current CH 255B Essex, CA) KHWY currently operates on channel 255B licensed to Essex, CA, and has a Construction Permit to also operate on 255B at a nearby site. The allotment of channel 255C at Moapa Valley is 224.71 kilometers from the KHWY licensed site, while 274 kilometers are required. This creates a prohibited short space of 49.29 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 280B at the licensed site of KHWY. The following sub change is required: the channel of the Vacant Allotment on 280B at Essex must be changed to 265B.

(1) **VAC 280B – Proposed channel 265B Essex, CA** (Current channel 280B Essex, CA). VAC channel 280B is currently allotted to Essex and has been vacant for ten years. The substitution of channel 280B for channel 255B for KHWY has a distance of 22.84 kilometers, while 241.0 kilometers are required to be fully spaced. This creates a short space of 218.16 kilometers. The Joint Parties propose to eliminate this short space by changing Vacant Channel 280B at Essex to channel 265B at its current site. The modification of channel 265B at Essex conflicts with one other station: KRRK channel 266C0 licensed to Lake Havasu City, AZ.

(2) **KRRK – Proposed channel 266C Spring Valley, AZ** (Current CH 266C0 Lake Havasu City, AZ). KRRK currently operates on channel 266C0. The distance between the Vacant Allotment site at Essex, CA, and KRRK (266C0) is 98.71

kilometers, while 214.0 kilometers are required to be fully spaced. This creates a prohibited short space of 115.29 kilometers. The Joint Parties propose to eliminate this short spacing by deleting channel 266C0 at Lake Havasu City and allotting MX channel 266C to Spring Valley, AZ, for use by KRRK. The allocation of Ch 266C at Spring Valley conflicts with four allotments and/or stations: (a) KNRJ Payson; (b) Vacant Channel 267C3 Ash Fork, AZ; (c) Vacant Channel 263C3 Paulden, AZ; and (d) Vacant Channel 269C3 Bagdad, AZ.

(a) **KNRJ(FM) – Proposed channel 240C1 Payson, AZ** (Current channel 266C1 Payson, AZ). KNRJ currently operates on channel 266C1 licensed to Payson, AZ. The distance between the reference site of KRRK (on Ch 266C at Spring Valley) and the operation site of KNRJ is 77.61 kilometers, while 270 kilometers are required for co channel fully spacing. This creates a prohibited short space of 192.39 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 240C1 for Payson at the KNRJ licensed site. The following two additional sub changes are required to substitute channel 240C1 for channel 266C1 at Payson.

(i) **KZGL – Proposed channel 239C3 Seligman, AZ** (Current channel 239C0 Cottonwood,AZ). KZGL currently operates on channel 239C0 licensed to Cottonwood, AZ. The substitution of channel 240C1 for channel 266C1 at the KNRJ licensed site has a distance to KZGL of 63.02 kilometers, while 259.0 kilometers are required to be fully spaced. This

creates a prohibited short space of 195.98 kilometers. The Joint Parties propose to eliminate this short space by deleting channel 239C0 at Cottonwood and allocating its MX channel 239C3 at Seligman, AZ for use by KZGL. This spectrum modification proposal for KZGL makes it fully spaced to channel 240C1 at KNRJ's licensed site by 8.06 kilometers. The allocation of channel 239C3 at Seligman requires no additional spectrum changes. The deletion of channel 239C0 at Cottonwood and its subsequent allotment to Seligman is also required in order to allow the currently licensed KZKE move to Desert Hills discussed later in the Counterproposal. Since Seligman has no aural service other than KZKE, KZGL on channel 239C3 will also be required to provide a remaining service. This is described in complete detail in the KZKE section of the Counterproposal.

(ii) **KWKM – Proposed Channel 251C** (Current channel 239C St. Johns, AZ). KWKM currently operates on channel 251C licensed to St. Johns, AZ. The distance between the reference site of KNRJ (on Ch 240C1 at Payson) and the licensed site of KWKM is 177.63 kilometers, while 209.0 kilometers are required for first-adjacent C to C1 spacings. This creates a prohibited short space of 31.37 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 251C for St. Johns at the KWKM licensed site. There are no additional sub changes required to

substitute channel 251C for channel 239C at St. Johns since channel 252A was deleted from Miami, AZ, in MB Docket 05-263.

(b) **VAC 267A –Proposed channel 277A Ash Fork, AZ** (Current CH 267A Ash Fork, AZ). Vacant channel 267A is currently allocated to Ash Fork, AZ. The allotment of channel 266C at Spring Valley, AZ has a distance of 114.91 kilometers to vacant channel 267A, while a spacing of 165.0 is required. This creates a prohibited short space of 50.09 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 277A for channel 267A at Ash Fork using the VAC 267A allotment site. This substitution requires a change for KZKE Seligman, AZ from channel 277C3 to channel 276C0. The KZKE upgrade is discussed in it entirety next in the Counterproposal. The substitution of channel 277A at Ash Fork requires no additional spectrum changes.

(i) **KZKE – Proposed channel 276C0 Desert Hills, AZ** (Current CH 277C3 (CP) Seligman, AZ). KZKE currently operates on channel 277A with a CP for channel 277C3 licensed to Seligman, AZ. The allotment of channel 276C0 at Desert Hills, AZ is mutually exclusive with the CP authorization of channel 277C3 at Seligman since it is short spaced by 6.93 kilometers (class C3 to class C0 1st adjacent channel 163.0 kilometers required, 156.07 kilometers actual). The deletion of channel 277A (and channel 277C3) at Seligman removes the only aural service licensed to

that city. Previously, in the Counterproposal, the Joint Parties discussed the modification of KZGL to delete channel 239C0 at Cottonwood and allocate MX channel 239C3 at Seligman. The KZGL spectrum modification is necessary (i) to substitute channel 240C1 for channel 266C1 at the licensed site of KNRJ Payson, AZ, and (ii) to provide seamless local aural service to Seligman. In addition, three other facilities are required to make spectrum changes in order for the allotment of channel 276C0 at Desert Hills to occur. The three facilities are: (1) KFTT 276C3 Bagdad; (2) Vacant Channel 275C3 Quartzsite, AZ; and (3) the CP on Channel 276C Hurricane, UT.

1. **KFTT– Proposed channel 299A Bagdad, AZ** (Current CH 276C3 Bagdad, AZ). KFTT currently operates on channel 276C3 licensed to Bagdad. The allotment of channel 276C0 at Desert Hills, AZ for use by KZKE has a separation distance to KFTT of 84.58 kilometers (CP) or 87.51 kilometers (license), whereas 226 kilometers are required to be fully spaced. This creates a prohibited short space of 141.42 kilometers (CP) or 138.49 kilometers (license). The Joint Parties propose to eliminate this short space by substituting channel 299A for channel 276C3. Detailed studies depict that the allotment of channel 299A for channel 276C3 will create no new white area. The substitution of channel 299A requires additional spectrum modifications.

a. **KVGS(FM) – Proposed channel 300C Meadview, AZ** (Current channel 300C Laughlin, NV). KVGS currently operates on channel 300C licensed to Laughlin, NV. The substitution of channel 299A at Bagdad has a distance of 154.38 kilometers, while 165.0 kilometers is required to be fully spaced. This creates a prohibited short space of 10.62 kilometers. The Joint Parties propose to eliminate the short space by deleting channel 300C at Laughlin and allocating channel 300C at Meadview, AZ, for use by KVGS. The allotment of channel 300C at Meadview, AZ is mutually exclusive with the KVGS license on channel 300C at Laughlin since it is short spaced by 269.53 kilometers (class C to class C co-channel 290.0 kilometers required, 20.47 kilometers actual). This spectrum modification will give a spacing clearance of 6.26 kilometers to channel 299A at Bagdad. Deleting channel 300C at Laughlin will deprive that community of its only local service. The Joint Parties propose to offer a replacement service at Laughlin by deleting channel 285A at Cal-Nev-Ari and reassigning it to Laughlin.

i. **New CP Ch 285A – Proposed channel 285C2 Laughlin, NV** (Current channel 285A Cal-Nev-Ari, NV). REPLACEMENT SERVICE. A new construction permit has been previously

granted for channel 285A at Cal-Nev-Ari, NV. The Joint Parties propose to delete channel 285A at Cal-Nev-Ari and allot MX channel 285C2 to Laughlin, NV for a seamless aural service as channel 300C (KVGS) is deleted. The allotment reference coordinates of channel 285C2 are only 13.74 kilometers from the CP site of channel 285A at Cal-Nev-Ari. Therefore, the replacement channel at Laughlin sites is MX with the new channel 285A CP at Cal-Nev-Ari. The deletion of channel 285A at Cal-Nev-Ari deletion will not deprive that community of its only aural service since the CP authorization has never commenced operations. The allotment of channel 285C2 as a replacement service at Laughlin requires one sub change.

(A) VAC 285C3 – Proposed channel 267C3 Peach Springs, AZ (Current channel 285C3 Peach Springs, AZ). Vacant channel 285C3 is currently allocated to Peach Springs. The addition of channel 285C2 at Laughlin has a distance of 132.51 kilometers to Vacant Channel 285C3 at Peach Springs, while 177.0 kilometers is required to be fully spaced. This creates a prohibited short space of 44.49 kilometers. The Joint Parties propose to eliminate this short space by

substituting channel 267C3 for channel 285C3. Channel 267C3 is available only inside the context of the Counterproposal since it requires the substitution of channel 277A for channel 267A at Ash Fork.

2. **VAC CH 275C3 – Proposed channel 265C3 Quartzsite, AZ** (Current CH 275C3 Quartzsite, AZ). VAC channel 275C3 is currently allotted to Quartzsite. The allotment of channel 276C0 at Desert Hills, AZ for use by KZKE has a separation distance of 97.84 kilometers, whereas 163.0 kilometers are required to be fully spaced. This creates a prohibited short space of 65.16 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 267C3 for channel 275C3 at the present allotment reference coordinates. Channel 267C3 is available only inside the context of the Counterproposal since it requires the deletion of channel 266C0 at Lake Havasu City.

3. **New Ch 276C – Proposed channel 276C Kanab, UT** (Current channel 276C Hurricane, UT). A New CP at Hurricane, UT is currently authorized to operate on channel 276C. The distance between the reference site of KZKE (on Ch 276C0 at Desert Hills) and the permitted site of the Hurricane New CP is 263.05 kilometers, while 281.0 kilometers are required to be fully spaced. This creates a prohibited short space of 17.95 kilometers. The Joint Parties propose

to eliminate this short space by deleting channel 276C at Hurricane and allocating channel 276C at Kanab. There are sub changes required to allocate channel 276C at Kanab. The allocation of channel 276C at Kanab (using the Kanab community coordinates as allotment reference) eliminates the prohibited short spacing to the allotment reference of channel 276C0 for KZKE at Desert Hills, AZ. However, channel 276C at Kanab does create a prohibited short space to vacant channel 278C1 at Fredonia, AZ. In addition, because the Hurricane authorization may be put into broadcast operation prior to the completion of the instant proceeding, the Joint Parties propose to provide a replacement service to Hurricane by deleting channel 260C at St. George, UT and allocating it to Hurricane for use by KONY.

a. **KONY - Proposed channel 260C Hurricane, UT (Current CH 260C ST. George, UT)**. REPLACEMENT SERVICE. The Joint Parties propose to provide a licensed, seamless aural service at Hurricane by deleting channel 260C at St. George, UT and allocating channel 260C to Hurricane for use by KONY. This change in community of license for KONY will require no technical changes since KONY is currently fully spaced and provides both line of sight and 70 dBu coverage to Hurricane. There will be no service area changes since all technical parameters will remain the same.

b. **VAC CH 278C1 – Proposed channel 247C1 Fredonia, AZ (Current CH 278C1, Fredonia, AZ)**. Vacant channel 278C1 is currently allocated to Fredonia. The distance between the allotment reference for channel 276C at Kanab and channel 278C1 at Fredonia is 34.66 kilometers, while 105 kilometers are required to be fully spaced. This creates a prohibited short space of 70.34 kilometers. The Joint Parties propose to eliminate this conflict by substituting channel 247C1 for channel 278C1 at the Fredonia allotment reference. This substitution requires only one additional spectrum modification.

i. **VAC CH 247C – Proposed channel 237C First Mesa, AZ (Current CH 247C, First Mesa, AZ)**. Vacant channel 247C is currently allocated to First Mesa. The substitution of channel 247C1 at Fredonia has spacing of 211.57 kilometers to the vacant allotment at First Mesa, while 270.0 kilometers are required to be fully spaced. This creates a prohibited short space of 58.43 kilometers. The Joint Parties propose to eliminate the conflict by substituting channel 237C for channel 247C at the allotment reference coordinates of the vacant channel at First Mesa. This substitution requires only one additional spectrum modification.

(A.) New Ch. 237C1 – Proposed channel 278C2 Teec Nos Pos, AZ (Current CH 237C1, Teec Nos Pos, AZ). A construction permit has been issued to operate on channel 237C1 at Teec Nos Pos. The substitution of channel 237C for channel 247C at First Mesa has spacing of 167.95 kilometers to the Teec Nos Pos CP site, while 270.0 kilometers are required to be fully spaced. This creates a prohibited short space of 102.05 kilometers. The Joint Parties propose to eliminate the conflict by substituting channel 278C2 for channel 237C1 with a site modification at Teec Nos Pos. This substitution is in conflict with the NPRM allotment of channel 279C at Church Rock (for use by KYVA), but not in conflict with the licensed site of KYVA. The distance between the proposed substitution of channel 278C2 at Teec Nos Pos and channel 279C at Church Rock is 157.32 kilometers, while 188.0 kilometers are required to be fully spaced. This creates a prohibited short space of 30.68 kilometers. Detailed studies have been conducted to identify a substitute channel for Church Rock, but none are available that satisfy the current spacing requirements. In addition, the Joint Parties' efforts to find a substitute channel for Church Rock are hampered by

requirements that any substitute channel be MX with the licensed facility of KYVA. Therefore, ***THE COUNTERPROPOSAL IS MUTUALLY EXCLUSIVE WITH THE NPRM'S PROPOSED ALLOTMENT AND MUST BE CONSIDERED ACCORDING TO THE COMMISSION'S ALLOTMENT PRIORITIES.***

(c) **VAC 263C3 – Proposed channel 228C3 Paulden, AZ** (Current CH 263C3 Paulden, AZ) Vacant channel 263C3 is currently allocated to Paulden, AZ. The allotment of channel 266C at Spring Valley, AZ has a distance of 71.45 kilometers to vacant channel 263C3, while a spacing of 96.0 is required. This creates a prohibited short space of 24.55 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 228C3 for channel 263C3 at Paulden with a modified allotment site. This substitution is possible due to the deletion of channel 228C2 at Laughlin, NV (KADD) and its subsequent allotment to Logandale, NV for use by KADD. See MB Docket 01-135.

(d) **VAC 269C3 – Proposed channel 290A Bagdad, AZ** (Current CH 269C3 Bagdad, AZ). Vacant channel 269C3 is currently allocated to Bagdad, AZ. The allotment of channel 266C at Spring Valley, AZ has a distance of 89.95 kilometers to vacant channel 269C3, while a spacing of 96.0 is required. This creates a prohibited short space of 6.05 kilometers. The Joint Parties propose to eliminate this prohibited short space by substituting channel 290A for

channel 269C3 at Bagdad using the community's reference coordinates. This substitution is possible after one additional spectrum modification: Vacant Channel 290C2 at Quartzsite, AZ must be changed to 251C2 with a site modification.

(i) **VAC CH 290C2 – Proposed channel 251C2 Quartzsite, AZ (Current CH 290C2, Quartzsite, AZ)**. Vacant channel 290C2 is currently allocated to Quartzsite. The substitution of channel 290A at Bagdad has spacing of 136.02 kilometers to the vacant allotment at Quartzsite, while 166.0 kilometers are required to be fully spaced. This creates a prohibited short space of 29.98 kilometers. The Joint Parties propose to eliminate the conflict by substituting channel 251C2 for channel 290C2 at a modified site for the vacant channel at Quartzsite. This substitution requires no additional spectrum modification since the proposed allotment of channel 252C1 at Parker was denied in MB Docket 04-252.

This concludes the spectrum modifications required to implement the Counterproposal.

EXHIBITS EXPLAINED

ADD Ch 256C Ely, NV

Exhibit E, Figure 1 is an allotment study for the allocation of channel 256C at Ely, NV. The study demonstrates that the proposed allotment is fully spaced with all known existing and proposed FM facilities with the exception of the licensed site of KBZB channel 255C Pioche, NV. A 70 dBu contour map is not included since the Ely community reference coordinates are used for the allotment of channel 256C. Figure 2 is a white area study demonstrating that a new wide area service at Ely will provide a first aural reception service to 802 persons and a second aural reception service to 395 persons.

KBZB

Exhibit E, Figure 3 is an allotment study for the allocation of channel 255C at Moapa Valley, UT. The study demonstrates that (i) the proposed allotment is MX with the licensed site of KBZB and (ii) it meets all additional spacing once channel 280B is substituted for channel 255B at Essex, CA (KHWY). Figure 4 is a 70 dBu contour map for a maximum class C. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 5 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 6 is a remaining services map showing that no white area is created by the instant counterproposal's deletion of channel 255C at Pioche.

KCLS (Replacement service)

Exhibit E, Figure 7 is an allotment study for the allocation of channel 268C at Pioche, UT. This is a replacement service for KBZB and uses the KBZB licensed site as reference. KBZB is a